

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

THOMAS BLAHA,

Defendant.

Civil Action No. 25-1569

**DECLARATION OF JACK
MCNEILY IN SUPPORT OF
MOTION FOR LEAVE TO
PROCEED ANONYMOUSLY**

I, JACK MCNEILY, declare as follows:

1. I am a partner with Latham & Watkins LLP, counsel for Jane Doe (“Plaintiff”) in the above-captioned litigation.

2. I am licensed to practice law in the State of New York and have been admitted by this Court. I make this declaration in support of Plaintiff’s Motion for Leave to Proceed Anonymously.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Pleading Transcript in *United States v. Blaha*, No. 20-cr-220 (E.D.N.Y. Feb. 15, 2022), ECF No. 36.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Criminal Cause for Sentencing in *United States v. Blaha*, 20-cr-220 (E.D.N.Y. Nov. 2, 2022), ECF No. 49.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 21, 2025.

/s/ Jack McNeily

Jack McNeily